

AO 91 (Rev. 08/09) Criminal Complaint

AUSA: A. Tare Wigod  
Special Agent: Joseph Vandenbossche, FBI

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America,  
v.  
John Dempsey Lassiter

Case: 4:13-mj-30290  
Assigned To : Hluchaniuk, Michael J.  
Assign. Date : 5/8/2013  
Description: SEALED MATTER (TH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of April 30, 2012, and May 30, 2012, in the county of Genesee, in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

Counts 1 and 3: 18 U.S.C. § 2113(d)  
Counts 2 and 4: 18 U.S.C. § 924(c)

*Offense Description*

Armed bank robbery;  
Using or carrying a firearm during and in relation to a crime of  
violence;

This criminal complaint is based on these facts:  
See attached AFFIDAVIT.

X Continued on the attached sheet.

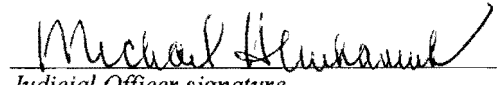
  
Complainant's signature

S/A Joseph Vandenbossche, FBI  
Printed name and title

Sworn to before me and signed in my presence.

Date: 8 MAY 2013

City and state: Flint, Michigan

  
Judicial Officer signature

Michael Hluchaniuk, U.S. Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Joseph Vandenbossche, being duly sworn, depose and state:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), assigned to the Detroit Division, Flint Resident Agency. I have been employed as a Special Agent since October of 2000. As an FBI Agent, I investigate criminal violations, including criminal investigations relating to bank robbery. In this capacity, I have had the opportunity to observe, assist, and participate in investigations relating to bank robbery.

2. The information included in this affidavit is provided for the limited purpose of establishing probable cause that John Dempsey LASSITER ("LASSITER") committed the following crimes: armed bank robbery, in violation of 18 U.S.C. §2113(d) (count 1), using or carrying a firearm during and in relation to a crime of violence, in violation of 18 U.S.C. §924(c) (count 2), armed bank robbery, in violation of 18 U.S.C. §2113(d) (count 3), using or carrying a firearm during and in relation to a crime of violence, in violation of 18 U.S.C. §924(c) (count 4). The affidavit, therefore, does not contain all of the facts known to me. Additionally, unless otherwise noted, wherever in this affidavit I assert that an individual made a statement, that statement is described in substance herein, and is not intended to be a verbatim recitation of such statement.

3. Counts 1 and 2 relate to a bank robbery that occurred at Citizens Bank on April 30, 2012; counts 3 and 4 relate to a bank robbery that occurred at Dort Federal Credit Union on May 30, 2012.

4. The facts set forth in this affidavit are based on my personal observations, my training and experience, information made available to me by other law enforcement professionals, and statements of witnesses.

5. For the following reasons, I believe that there is probable cause to conclude that John Dempsey LASSITER committed the above-described crimes.

**April 30, 2012, Armed Robbery of Citizens Bank**

6. On April 30, 2012, law enforcement personnel responded to Citizens Bank located at 4813 Clio Road, Flint, Eastern District of Michigan after a report of a robbery. Citizens Bank is federally insured.

7. According to witnesses at the scene, three black male subjects entered the bank wearing gloves, head coverings, and bearing firearms. Two subjects jumped the teller counter and obtained money from the bank. The third robber stayed in the lobby brandishing a long gun. After obtaining the money, the three subjects fled the bank and entered a vehicle that was parked in front of the bank.

8. An audit of the bank's records revealed that the robbers stole approximately \$18,375.00 in cash.

9. A witness reported that the vehicle used in the robbery was a blue two door Monte Carlo. Within two hours after the robbery law enforcement officers located a blue Chevy Monte Carlo a short distance from the bank parked in the driveway of an abandoned residence. The vehicle was registered to Twylla Walker.

**May 30, 2012, Armed Robbery of Dort Federal Credit Union**

10. On May 30, 2012, at about 10:15 a.m., law enforcement personnel responded to Dort Federal Credit Union located at 5091 West Pierson Road, Flint, Eastern District of Michigan after a report of a robbery. Dort Federal Credit Union is federally insured.

11. According to witnesses at the bank and surveillance video, two black males entered the Dort Federal Credit Union wearing facial coverings, gloves, and bearing firearms. One male

jumped the teller counter and proceeded to the cash vault where the branch manager and assistant were counting the recent cash delivery. The subject demanded money while pointing the firearm at the bank employees. Per the instruction of the subject, the bank employees placed numerous bundles of money into a pillowcase provided by the subject. While the one male suspect was in the vault, the other male suspect stood in the bank lobby brandishing a firearm. After obtaining the money, both subjects left the bank together and fled in a vehicle.

12. An audit of the credit union records revealed that the robbers stole approximately \$379,932.00 in cash from the credit union.

**Interviews of Confidential Human Source-1**

13. I, along with other law enforcement officers, interviewed confidential human source-1 (CHS-1) on multiple occasions regarding, among other things, his/her involvement in the above-described armed bank robberies.

14. Among other information, CHS-1 explained that on April 30, 2012, he/she, Rodney Burse, Demond Ontario Wilson, Percy Solomon Dendy, and LASSITER, robbed the Citizens Bank on Clio Road. CHS-1 advised that a blue Chevrolet Monte Carlo was obtained from an individual by the name of Twylla Walker to use in the robbery.

15. CHS-1 explained that just prior to the robbery the participants met at a designated rendezvous point. CHS-1 stated that he/she, Dendy, and LASSITER drove in the Monte Carlo while Burse and Wilson drove in another car. CHS-1 further explained that Burse and Wilson drove by the bank to make sure that it was an appropriate time for the others to approach and enter the bank. CHS-1 explained that he/she, LASSITER, and Dendy entered the bank all armed with firearms. CHS-1 stated that LASSITER and Dendy jumped the teller counter and obtained money from the bank. The three then left the bank with the stolen money and entered the Monte

Carlo. CHS-1 drove to a rendezvous point where they left the Monte Carlo and entered another car. CHS-1 further explained that after the robbery Burse and Wilson were waiting at the rendezvous point. Once at the rendezvous point, CHS-1 stated that Burse and Wilson took the stolen money in their car and the other participants got into a different car. A short while later, the participants reconvened near Burse's residence where they divided up the money. CHS-1 explained that approximately seventeen thousand dollars was stolen in this robbery, and she/he received about three to four thousand for his/her role.

16. CHS-1 advised that another robbery in which she/he participated occurred at the Dort Federal Credit Union on Pierson Road in Flint, Eastern District of Michigan, on May 30, 2012. CHS-1 stated that on the day prior to the Dort Federal robbery, she/he, Burse, and LASSITER were driving around in Burse's white Cadillac Escalade looking for banks to rob. CHS-1 stated that they stopped at Dort Federal and Burse entered the bank to surveil it. According to CHS-1, Burse had an account at Dort Federal and purchased a money order while inside the credit union surveilling it. Moreover, according to CHS-1, a grayish colored Saturn with Mississippi plates was obtained to use in the robbery.

17. CHS-1 explained that on the day of the robbery, she/he and LASSITER drove to the credit union in the Saturn while Burse and Wilson drove near the credit union in a different car. CHS-1 explained that Burse and Wilson were in the vicinity of Dort Federal watching the bank traffic and determining when it would be a good time for CHS-1 and LASSITER to enter the bank. According to CHS-1, they were communicating using the previously purchased walkie-talkies. CHS-1 explained that during the robbery, she/he and LASSITER had firearms, which were openly displayed to bank employees. Upon entering, LASSITER ran to the back of the bank where he took bank funds while CHS-1 stayed in the lobby. After stealing the money,

CHS-1 and LASSITER drove in the Saturn to a rendezvous point where they entered a different vehicle. CHS-1 stated that they drove away from the rendezvous point and, while driving, Burse and Wilson pulled next to them where CHS-1 handed the bag of money to Wilson and Burse. According to CHS-1, the four met up later at a residence and divided the money. CHS-1 advised that several hundred thousands of dollars were obtained from the Dort Federal robbery and that the four participants each took at least fifty thousand dollars.

18. Also, according to CHS-1, LASSITER used the proceeds of the May 30<sup>th</sup> Dort Federal robbery to purchase a 2002 white Cadillac Escalade, which, as of July 3, 2012, LASSITER was still driving.

#### **Additional Investigation**

19. On August 13, 2012, LASSITER was stopped by the Michigan State Police for a traffic violation. At the time, LASSITER was driving a 2003 white Cadillac Escalade. LASSITER told the law enforcement officer that the vehicle was his “aunties” but he was not sure of her last name. According to Michigan Secretary of State records the vehicle was purchased by Caralene Tyus on June 2, 2012, a few days after the May 30 Dort Federal robbery.

20. I reviewed the surveillance video from Dort Federal Credit Union from May 29, 2012, the day prior to the robbery. The video depicts Burse, at approximately 10:25 a.m., entering the bank, standing at the teller counter, conducting a transaction, and then leaving the bank. Additionally, records obtained from Dort Federal Credit Union indicate that on May 29, 2012, Burse, a credit union member, purchased a money order from Dort Federal Credit Union in the amount of \$145.00.

21. I have conducted a review of the NCIC database and the 7<sup>th</sup> Circuit Court Genesee County for criminal records related to John Dempsey LASSITER. The review of LASSITER’s

criminal history reveals that he has the following felony convictions: 1994-armed robbery and felony firearm, 3<sup>rd</sup> Circuit Court, 93-010159-FC; 1989-assault with intent to murder, 7<sup>th</sup> Circuit Court, 88-40413-FC.

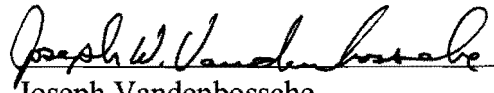
**Corroboration of CHS-1**

22. I believe that the above-described information provided by CHS-1, who is a cooperating witness attempting to earn a sentence reduction, is credible and reliable for the following reasons:

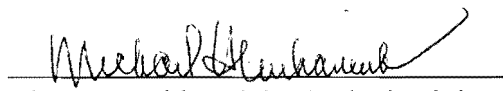
- a. While the identity of CHS-1 is not set forth in this affidavit (for his/her protection and to protect the integrity of the investigation), he/she has provided to me his/her identity, including true name, address, date of birth, and other personal identifying information. Furthermore, I did, under oath, identify the true name of CHS-1 to the issuing magistrate;
- b. CHS-1 has personal knowledge of the information provided in this affidavit through her/his interactions with LASSITER in furtherance of the criminal activities;
- c. CHS-1 has provided information to law enforcement for approximately the past eight months on this and other investigations. The information provided has been extremely reliable and law enforcement has been able to corroborate critical portions of the information obtained from CHS-1;
- d. Several important items of information provided by CHS-1 on this case have been independently corroborated by law enforcement:
  - i. as mentioned, CHS-1 informed law enforcement that on the day prior to the Dort Federal robbery, Burse entered the credit union to evaluate whether it was a suitable target to be robbed and purchased a money order while there. The surveillance video and bank records confirm these statements of CHS-1;
  - ii. the amounts of money that CHS-1 stated were stolen on the two bank robberies outline in this affidavit is consistent with the amount of money actually stolen from the robberies;
  - iii. CHS-1 informed law enforcement that a blue Chevrolet Monte Carlo obtained from an individual by the name of Twylla Walker was used in the April 30<sup>th</sup> robbery of Citizens Bank. A review of the registration of the recovered blue Monte Carlo revealed Twylla Walker as the registered owner.
  - iv. CHS-1 provided information that LASSITER used the proceeds of the bank robberies to purchase a 2002 white Cadillac Escalade. On August 13, 2012, LASSITER was stopped by the Michigan State Police driving a 2003 white Cadillac Escalade.

**CONCLUSION**

23. Based on the aforementioned information, I respectfully submit that there is probable cause to believe that John Dempsey LASSITER committed the following crimes: armed bank robbery, in violation of 18 U.S.C. §2113(d) (count 1), using or carrying a firearm during and in relation to a crime of violence, in violation of 18 U.S.C. §924(c) (count 2), armed bank robbery, in violation of 18 U.S.C. §2113(d) (count 3), using or carrying a firearm during and in relation to a crime of violence, in violation of 18 U.S.C. §924(c) (count 4).

  
Joseph Vandebossche  
Special Agent, FBI

Subscribed and Sworn Before me  
this 8th day of May, 2013

  
The Honorable Michael Hluchaniuk  
United States Magistrate Judge